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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**META PLATFORMS, INC.'S
RELEVANT MARKETS TUTORIAL
SUBMISSION**

Judge: Hon. James Donato

1 Since its inception almost twenty years ago, Facebook (now Meta) has faced vigorous
2 competition for users' time and attention from a broad array of competitors. Facebook started as
3 a way for users to connect, share, and find community primarily with their friends and later family
4 or other connections. But over time, that "friends and family sharing" became a small part of the
5 experience on Meta's family of apps (which now includes Facebook, Instagram, Messenger, and
6 others). And critically, it in no way defines or constrains Meta's products and services or the scope
7 of competition Meta faces. Meta competes for *engaged* user time and attention across a variety of
8 features and activities. Maintaining and growing user engagement by offering features and user
9 experiences that attract users to choose to spend their time on Meta's family of apps is one of
10 Meta's most fundamental business goals. Meta then monetizes its services by providing tools and
11 systems for businesses to manage and optimize advertising campaigns that can be shown to Meta's
12 engaged users. As a result, Meta faces constraining competition for users' time and attention from
13 many services, including TikTok, YouTube, Apple (iMessage), Twitter, Snapchat, LinkedIn,
14 Reddit, Pinterest, Telegram, and many others. And on the advertising side, Meta faces yet more
15 formidable competition, including from the companies listed above and Google, Amazon,
16 Microsoft, Apple, television, streaming services, and much, much more.

17 The competition for engagement is pivotal to Meta's time-honored business model of
18 advertisement-supported services because that engagement and the resulting time and attention is
19 what advertisers demand when they purchase advertising. What the Court will hear—over and
20 over again—is that advertisers watch for and make spending decisions based on their return on
21 investment. Advertisers have no shortage of options on where to spend their ad budgets. If Meta
22 does not deliver engaged users, which then allow advertisers to meet their advertising goals, then
23 advertisers can easily take their dollars elsewhere. Advertisers can and do switch between
24 advertising venues, sometimes on a daily basis. Meta believes it offers advertisers a superior
25 experience, but this does not mean Meta does not face meaningful competition across many fronts.

26 Critically, advertising on Meta is not distinct from advertising through a host of other
27 sources, digital and non-digital alike. Meta competes for ad budgets with providers of all forms
28 of advertising. The made-up construct of "social advertising" disregards the direct and constant

1 competition Meta faces for advertising budgets with Google, Amazon, Apple, TikTok, video
 2 streaming platforms, television, print media, and others. Most advertisers are platform-agnostic,
 3 and seek only to reach their target audiences while getting the best return on their advertising
 4 investment. Advertisers can achieve their goals elsewhere, and especially when they receive
 5 results in real time, they may redirect where they spend their advertising dollars.

6 **I. PRESENTER BIOGRAPHY**

7 Alex Schultz, Meta's Chief Marketing Officer and Vice President of Analytics, will present
 8 for Meta at the tutorial. After graduating from the University of Cambridge, Mr. Schultz worked
 9 in marketing at eBay before joining Meta in 2007. He is based in London.

10 Mr. Schultz began his career at Meta working on Meta's self-service advertising tool, Ads
 11 Manager. Mr. Schultz was instrumental in growing the Facebook, Instagram, and Messenger apps
 12 to over a billion users each. He pioneered Meta's integration of product and direct response
 13 marketing and has run some of the biggest, most effective online advertising campaigns in the
 14 company's history. Mr. Schultz has deep insight into the interrelated nature of the competition
 15 Meta faces for users and advertisers. Since 2015, he has also led Meta's analytics team. In that
 16 capacity, Mr. Schultz identifies and evaluates data that Meta uses to measure itself against
 17 competitors. Mr. Schultz is also responsible for Meta's global consumer marketing organization
 18 and for promoting Meta's brand, products, and services. He therefore will offer the Court his
 19 perspective as not only a seller of advertising, but also as an ad buyer.

20 **II. COMPETITION FOR USERS**

21 It has never been easier for a website or app to acquire users. A few users of a new app
 22 can share their mobile contacts with the app, and begin engaging with existing connections on the
 23 new product instantly. App developers can also drive a large volume of downloads simply by
 24 advertising on a competitor's site. TikTok, for example, did both effectively. It very effectively
 25 advertised on Meta's apps to quickly amass a large user base, and it prompts users to share their
 26 contacts and follow suggested friends. LinkedIn and Snapchat also grew by prompting users to
 27 share their contacts with the service. This is not a new trend—for example, Myspace contributed
 28 to YouTube's growth by allowing embedded videos on users' pages—but has recently accelerated.

1 Competition for user engagement is the core battlefield. Advertisers demand and pay for
 2 *engaged*, active users. That is why Meta is focused on competing to engage active users. It closely
 3 monitors the number of users who actively use its products on a monthly or daily basis (Monthly
 4 Active Users (MAU) and Daily Active Users (DAU)), their Time Spent doing so, and other metrics
 5 of engagement (interaction with ads, for example). Every time a user opens her phone or computer,
 6 she is choosing between Meta’s products or those of a competitor’s, such as TikTok, Snapchat,
 7 Twitter, YouTube, iMessage, or Reddit, among others. There are countless apps and services that
 8 offer users the ability to connect with one another, discover content, and be entertained. User
 9 preferences ebb and flow, and innovative new activities and ways of driving engagement force
 10 Meta and its competitors to stay on the cutting edge. Indeed, Meta spends billions of dollars a year
 11 on research and development—on new and existing features—to keep up with intense competition.

12 A. Product Evolution in Response to Competition and Technology Improvements

13 The products that Meta offers today bear little resemblance, either in appearance or
 14 function, to Facebook when it originally launched. The dynamic nature of the industry has
 15 required Meta to evolve and innovate to keep its users engaged, which it continues to work on
 16 every day. A handful of these many innovations are chronicled below.

17 1. *News Feed*

18 In the early days of Facebook, users had to discover content by manually browsing across
 19 pages or searching for it. To improve this clunky and time-consuming aspect of the user
 20 experience, Meta launched the News Feed in 2006. News Feed presents new information for the
 21 user to view in a single stream of updates. This was revolutionary. At the time, none of Facebook’s
 22 competitors had a similar feature. News Feed was so successful that it soon became ubiquitous
 23 across rival services. Tumblr quickly launched its “dashboard,” Twitter followed with “Instant
 24 Timeline,” and Pinterest introduced a “home feed.” Today, TikTok, YouTube, Nextdoor,
 25 LinkedIn, Snapchat, and others use a version of feed-based sharing. This innovation also helped
 26 Facebook expand beyond sharing among direct connections (including friends and family), as
 27 News Feed brought a broader range of content, such as interest-based posts, videos, and news
 28 articles, to the center of the user experience.

1 2. *Messaging and Calling*

2 While News Feed facilitated large-scale discovery and broadcast sharing, user demand
 3 emerged for communications services facilitating one-to-one threads and group chats. Messaging
 4 is an inherently social function, and Meta has substantially expanded its offerings in messaging
 5 and direct sharing over time. While messaging functionality was originally integrated and
 6 successful on the Facebook desktop experience (accessed through a web browser), the shift
 7 towards mobile apps as smartphones became ubiquitous intensified competition for messaging,
 8 with iMessage becoming the dominant messaging app on mobile, which prompted Meta to launch
 9 its own messaging service (Messenger) and later to acquire and develop WhatsApp. Instagram
 10 also offers Direct Messaging, and each of Meta's apps now facilitate video calls.

11 Messaging has become the leading means for sharing among users' friends and family. In
 12 the United States, Meta's messaging products lag behind Apple's proprietary services iMessage
 13 and FaceTime. Both are extremely popular products that come pre-installed on every iPhone. In
 14 fact, iMessage is the leading messaging app in the United States, and it continues to expand its
 15 lead. Twitter, Snapchat, Signal, Telegram, and many other widely used apps likewise offer
 16 messaging capabilities. Indeed, TikTok recently expanded its own messaging feature.

17 Facebook also offers the popular Groups feature, allowing users to connect, learn, and
 18 share based on similar interests, hobbies, and passions. Here too, Meta is not unique. Apps like
 19 Discord, for example, which allow users to join interest-based chat and sharing threads, have
 20 entered the space, adding more competitors to Groups. And messaging competitors, including
 21 iMessage and others, are of course core competitors for small group interaction. Many users are
 22 now members of multiple group chats in different places.

23 3. *Stories*

24 In March 2012, the Korean messaging app KakaoTalk launched KakaoStory, an innovative
 25 way for users to share photos and short videos for a limited period of time. The app quickly
 26 amassed over ten million DAUs who published hundreds of millions of stories, and commented
 27 billions of times on those stories, every day. The industry quickly responded. Snapchat, which
 28 was already in the market as an ephemeral photo-sharing and messaging app, followed with its

1 own Stories feature over a year later. Meta launched Instagram Stories, which it later expanded to
2 Facebook, and introduced WhatsApp Statuses, a similar method for ephemeral sharing. Sharing
3 via stories is now a central component of the user experience, both on Meta's apps and on the
4 extensive set of competitive apps that also offer story-based sharing, including LinkedIn, Pinterest,
5 YouTube Stories, TikTok and even the mlb.com app. Moreover, just this past November, Signal
6 launched its version of Stories, describing it as one of the most common feature requests from their
7 users because users have integrated stories into the way that they connect with one another.

8 4. *Long-Form Video*

9 While YouTube pioneered streaming videos on the Internet when it launched in 2005,
10 Facebook has also long offered the ability to watch videos on its website and app. Video sharing
11 and consumption were important aspects of the user experience on Facebook and many of its early
12 competitors—including Myspace, which allowed users to embed YouTube videos directly on their
13 pages—and it continues to be. In recent years, user time spent watching videos on Meta's apps
14 and Meta's competitors' has increased substantially. So much so that watching video—including
15 video content from users and sources to whom the viewer is not directly connected, like a public
16 figure or news source—has come to account for the majority of time spent on Facebook. As users
17 have shown an increased interest in video, Meta has worked to provide users with an engaging
18 video streaming experience within its apps. For instance, in 2017 Meta introduced Watch and
19 Scroll. Scroll is a picture-in-picture feature that allows users to scroll through their News Feeds
20 while a video is playing. Meta also launched Facebook Watch, its foray into original content
21 including new shows like Red Table Talk. Meta and others have also invested in programs to
22 entice content creators to their apps tied to the engagement their content drives. Users now spend
23 more time on Facebook streaming video than they do on any other activity on Facebook.

24 5. *Short-Form Video*

25 In the past few years, largely prompted by the meteoric rise of TikTok, short-form video
26 has emerged as an increasingly important form of user engagement on YouTube, Snap, and Meta's
27 apps, among others. This is particularly true, although not exclusively, among younger users.
28 Short-form video creates a sense of belonging and an opportunity to interact with others who share

common interests or to stay current with the latest trends (a viral dance challenge or recipe or beauty tip, for example). Users can create and share videos, and they can like, share, and comment on short-form videos—as they do to long-form videos and on News Feed—created by users outside their network. With the introduction of Reels in August 2020, many Instagram and Facebook users now share short-form videos with a broader audience, or watch videos created by users that they follow (a celebrity or influencer, for example) or to whom they are otherwise not connected at all, much as they do on TikTok or YouTube Shorts. At the same time, TikTok is expanding its reach into “friends and family” sharing by aggressively prompting users to upload their mobile contacts, suggesting “people you may know” to follow, and asking users to invite friends to TikTok to facilitate in-app interactions among existing contacts, and by promoting messaging heavily to drive engagement in more private contexts within the app.

B. Competition for User Engagement is Dynamic

Meta does not compete in a static industry. The features and experiences that users find engaging are constantly evolving, and firms are in a race to provide the most compelling experiences to meet users’ ever-shifting needs as technology improves to facilitate innovations.

1. *The Industry Is Always Evolving*

The evolution of Meta’s apps has taken place against a backdrop of a series of sea-changes in technology that have changed the way users engage with content. When Facebook launched in 2004, its functionality reflected the limits of the Internet at the time. Pages were largely static, most often viewed on computers, and offered few opportunities for interaction. Facebook’s innovations in developing interfaces allowing other users to comment on, post, or “like” material on another user’s page helped usher in the modern, user-driven era of the Internet.

With the advent of the smartphone, user engagement moved increasingly to mobile devices. Meta and other firms needed to meet users where they were by creating compelling mobile experiences. Meta launched a mobile app, and enhanced its messaging capabilities to compete with SMS texting and Apple’s pre-installed iMessage. Other mobile-based competitors like KakaoStory in Korea and Snapchat emerged to leverage mobile-only features, like smartphones’ integrated cameras and vertical orientation for displaying content. Meta and others

1 met that challenge by adopting and improving, among other things, story-based sharing features.

2 As mobile devices became more sophisticated, and users began accessing high-speed
3 internet remotely through mobile broadband and enhanced wireless networks, new threats
4 emerged. Mobile video streaming became more viable and ubiquitous because of increased
5 connection speeds, which strengthened established competitors like YouTube and allowed novel
6 video-based use cases, like TikTok's short-form streaming, to emerge. There is a seemingly
7 endless stream of new ways for users to spend time online, facilitated by rapidly changing
8 technologies and innovators with the drive to execute on compelling and differentiated concepts.
9 New entrants like Twitch, TikTok, and BeReal have grown exponentially in the past few years.

10 2. *Firms Compete on Quality of Their Features*

11 Meta and other firms compete through improving the quality of the user experience by
12 constantly adding new and improved features. The products are free, so users are not choosing on
13 price. They are drawn to the best experience and feature set. People do not need Facebook and
14 Instagram. Instead, they use these services, for example, to be entertained, to connect with a group
15 with shared interests, to discover and learn about things they love, or to share content with friends
16 and family or more broadly with the public at large. Facebook and Instagram can help them do
17 any or all of that, but so can countless other apps, and in a variety of different ways. Users will
18 pick whichever services and apps provide them with the best experiences. As users' preferences
19 evolve and users are exposed to apps offering new use cases, Meta and others must also evolve
20 and innovate to keep users engaged. TikTok is just one example: as TikTok launched and gained
21 popularity, Meta, YouTube and others launched short-form video functionality to keep up. In the
22 same vein, competition to provide the most engaging user experience and feature set has driven
23 TikTok to adopt similar features to its competitors, including Meta.

24 It is no surprise that competition for user time and attention is fierce. Any individual user
25 only has so much time to devote to entertainment and social interaction. Every day, existing apps
26 and offerings compete for that time, and every day, there are new apps or offerings that are fighting
27 to do the same. If Meta is not interesting and relevant to its users, users will engage less. Meta is
28 able to continue innovating and providing useful and engaging products for its billions of users by

generating ad revenue, the same business model used by television, radio, and newspapers. Meta grows engagement of its users by continually improving the quality of its products, offering new features or ways to consume content, and evolving to meet user demands as they change.

III. COMPETITION FOR ADVERTISERS

Meta is in the advertising business—it makes money by showing ads to its engaged users. Like the competition for those users’ time and attention, the competition for advertisements to show those users is fierce. Businesses constantly change where they spend advertising dollars. Opportunities to show advertisements are ubiquitous and exist essentially anywhere there are consumers. Across the multitude of formats and venues available—including print, television, online, and out-of-home—advertisers can reach the same audience in multiple places. As a result, advertisers can and do shift their spend, often in real-time, across these options to reach their desired audience in the most favorable context to optimize return on advertising spend.

All advertising involves choices about targeting. For example, the most effective context in which to reach an audience of luxury traveler customers may well be in the *Conde Nast Traveler* magazine, or on a billboard next to the first-class lounge at the airport. Showing a travel ad to a user through an online venue like Meta—which could understand from the user’s revealed preferences and activities on the apps that she is interested in travel—is not necessarily more targeted than advertising to the same person in a travel publication where they have revealed their interest in traveling by picking up the magazine. Indeed, targeting via a magazine with a specific subscriber base or via a billboard in a specific geographic location could be more precise and yield better outcomes for an advertiser than an ad on Facebook.

Competition for advertising dollars is based on which venue, or combination of venues, can most efficiently reach the advertiser’s intended audience of consumers and drive the advertiser’s desired outcome. Advertising on Meta offers a compelling value proposition for some advertisers because it delivers results. But the advantages it offers are not unique. And Meta must continuously innovate against many competitive venues while keeping its user base engaged.

Advertisers approach Meta with a variety of goals and expectations. Like its competitors, Meta is expected to allow advertisers to get reliable results as easily and cost-effectively as they

can elsewhere. Advertisers are focused on results and decide where to advertise based on the results they get. Ad formats, targeting, and advertiser tools like analytics or content-creation tools are part of the value proposition for Meta and its many competitors. Ultimately, if Meta ads are not effective, and its competitors' ads are more effective, then advertisers will go elsewhere.

A. Self-Service Platform

Nearly all ads on Meta's properties are purchased through Meta's Ads Manager. Ads Manager is a "self-service" ad buying tool that allows individual advertisers, of any size, to purchase advertising and set parameters for their ad campaigns in a single interface. Many of Meta's competitors, such as Google, Amazon, Apple, TikTok, Hulu, Pinterest, and Twitter, also offer self-service ad-buying tools. Self-service tools make advertising accessible, and give advertisers the control to start, pause, expand, or reduce spend on a particular venue in real time.

B. Campaign Objectives

Advertisers come to Meta with varying objectives. Advertisers are given the ability to set an "Objective" for their ad campaign, which is the goal that the advertiser wants to achieve. Meta adjusts the way it delivers the advertiser's ad in order to best achieve the advertiser's Objective.

Some of Meta's ad campaign Objectives contemplate the user taking a specific action in relation to the ad that they are shown. The "Traffic" Objective is designed to steer users to a destination, like the advertiser's website or app. The "Engagement" Objective seeks consumers who will interact with the advertiser's business or page in some way, such as by liking or following the Facebook page of a large travel accessory retailer or messaging a boutique travel agency to set up a consultation. And Meta's "App Promotion" Objective helps developers drive installation of their apps, which of course competes with Apple's App Store advertising among others.

Advertisers can also set a "Sales" Objective, which aims to find consumers likely to purchase the advertiser's goods or services at the time they see the ad. There is a wide range of options available to advertisers pursuing this Objective. Advertising on Google Search, Bing Search, and Yelp are very effective at driving actions, as consumers in those contexts may already be looking for a particular product, and ad opportunities exist in the results shown to users after they search for it. Amazon has also recently emerged as a very strong alternative for advertisers

1 seeking to drive sales. Many product searches begin (and end) on Amazon’s online shopping
 2 platform, and Amazon has become increasingly skilled at using the information it gleans from its
 3 customers to show them ads for products they are likely to buy.

4 The “Leads” Objective focuses on collecting leads for the advertiser—for example,
 5 encouraging potential customers to join a boutique travel agency’s mailing list or giving the agency
 6 leads on individuals that might have an interest in a particular activity. The agency can then engage
 7 directly with the lead (on the phone or by email), help them book that activity, and ideally, sign
 8 them up as a long-term client. Lead generation is not novel. It has been around for as long as
 9 people have been advertising products and services because it gets advertisers results.

10 The Awareness Objective is age-old. To achieve the Awareness Objective, Meta will make
 11 sure the ad reaches as many people as possible, within the advertiser’s targeting criteria and budget,
 12 with the goal of reaching the audience most likely to remember the ad. Advertisers with an
 13 Awareness Objective have a wide range of options available to them. Google is very effective at
 14 placing ads on third-party websites to reach users casually browsing the web, which is an effective
 15 context for Awareness ads. So are TV spots—like ads during the Super Bowl or other big events.

16 C. Target Audience

17 After setting an objective, an advertiser using Meta Ads Manager can specify the users to
 18 whom it wants to show its ad. Targeting ads is not unique to Meta; nearly all ads are targeted. For
 19 example, showing a travel ad for a luxury trip on Facebook may not be any more targeted (and
 20 indeed, is potentially far less targeted) than showing the same ad in a high-end travel magazine
 21 read by consumers who are already interested in that sort of travel, or on the Travel Channel, where
 22 the same is true. There are three main tools a Meta advertiser can use to select its audience: (1)
 23 Core Audiences, (2) Custom Audiences, and (3) Lookalike Audiences.

24 Core Audiences allows advertisers to target their ads to users who meet the advertiser’s
 25 criteria, such as location, age range, and interests. This is not a unique feature. Nearly every
 26 online advertising venue facilitates this kind of targeting. And it is also achievable offline—an
 27 advertiser may choose to purchase an advertisement in a particular magazine or during a particular
 28 television show based on its general subscriber or viewer characteristics and demographics

(advertising a luxury vacation in a luxury travel magazine or during a travel show, for example).

Custom Audiences allows the advertiser to provide Meta with a preset list of its intended audience to which Meta will target the ad. In many cases, this will be a list of prior customers or leads the advertiser has generated. For example, a large travel accessory retailer may have the email addresses of customers who have bought luggage from its website, or a boutique travel agency may have a mailing list of prospective customers. Meta can use that information (which is provided with privacy-protections) to help identify the customers' Facebook accounts and show the retailer's ad to those users. Many of Meta's competitors have the same capabilities, including Google, Apple, Amazon, TikTok, LinkedIn, and Pinterest. Importantly, the targeting data used here is the advertiser's, not Meta's—it can be used anywhere that offers a custom audience feature.

Lookalike Audiences is a feature that identifies new users with similar characteristics and interests to the users in the advertiser's Custom Audience, and shows the ad to those new users. For example, if Meta determines that many users in the boutique travel agency's Custom Audience are interested in Ecotourism, Meta can show the ad to other users with that interest who are not in the Custom Audience. This feature is also available from many of Meta's advertising competitors.

D. Ad Format and Placement

Meta offers dozens of ad Placement options, including allowing the advertiser to select specific features and pages on Meta's apps in which its ad will appear—such as the Facebook or Instagram Feeds, Reels, or in Facebook Search Results. Certain ad formats work better in particular Placements. For example, a video ad that displays vertically on the screen is best suited for one of Meta's video features, like Reels or Facebook Watch. In Ads Manager, the advertiser can select from these options or allow Meta to manage the Placement.

To be sure, different ad venues may offer different ad formats including formats that uniquely serve the channel and get advertisers the best results. For radio (traditional or streaming), for example, an ad voiced by a DJ or by a celebrity might deliver the best results. Different channels (digital and non-digital) may thus innovate with new formats, but they all compete widely on results they drive for advertisers. Notably, however, virtually every ad format available through Meta can be found elsewhere. Advertisers can use the same creative across multiple venues, for

instance by running the same video ad they would show through Reels on TikTok, YouTube, or television, or by placing the same image-based ad they would show in Facebook News Feed on ad space on a third-party website purchased through Google. Of course, ad formats have also evolved as the venues have evolved—ads now frequently appear as stories or short-form videos.

E. Campaign Performance Measurement

Once the ad is up and running, Meta provides advertisers with dozens of detailed and dynamic measurement tools demonstrating the performance of the ad campaign as it progresses. These tools show, among other things, how many times the ad was shown, how many times someone clicked on the ad, and how many people bought the product because of the ad.

Fundamentally, advertisers—large and small—look first and foremost at the results they see in their own data to determine whether or not they get more customers, leads, or visits to their site when they buy an ad. Many advertisers then use telemetry from third party data and Meta’s tools to measure how they got those results and what they spent to get them. If these data show that an ad campaign on Meta is delivering unsatisfactory results, the advertiser can immediately stop the campaign and reallocate its spend to another venue. Advertisers are able to switch between ad venues easily in part because ad creatives are largely portable. For example, the same 30 second ad for a hotel chain could be shown on broadcast, cable, or streaming TV (tied to a travel show, for example), on Facebook, TikTok, YouTube, or on a webpage for a travel magazine.

Many advertisers—particularly large, sophisticated buyers with complex budgets and often an ad agency assisting them—reallocate spend on an hourly or daily basis. And all advertisers have the ability to react to real-time data on the performance of their campaigns. Moreover, nearly all major online ad venues—including Google, Amazon, Apple, TikTok, LinkedIn, and Pinterest—offer their own measurement information for advertising on their platforms. The performance data that all these competitors provide advertisers are inputs in spend allocation decisions and facilitate switching across venues.

IV. CONCLUSION

Meta faces ferocious competition for both the time and attention of engaged users and the budgets of advertisers. We look forward to discussing these issues further at the tutorial.

1
2 Dated: February 17, 2023

Respectfully submitted,

3 By: /s/ Sonal N. Mehta

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28

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2023, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System.

/s/ Sonal N. Mehta

Sonal N. Mehta